

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

TUSHBABY, INC.,

Plaintiff,

v.

ZOOYEE, a Foreign Corporation,

Defendant.

Consolidated Case No. 1:24-cv-21136-  
LEIBOWITZ/TORRES

**REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT ZOOYEE**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff TUSHBABY, INC. (“TUSHBABY” or “Plaintiff”) moves for entry of default against Defendant ZOOYEE (“ZOOYEE” or “Defendant”).

Defendant was properly served with the complaint, summons, and civil cover sheet in this matter on April 12, 2024, as evidenced by proof of service on file with this Court. [ECF No. 19]. Thereafter, counsel appeared for Defendant, but Defendant did not respond to the original complaint. [ECF No. 27]. Thereafter, on September 18, 2024, Plaintiff filed its Amended Complaint against Defendant. [ECF No. 91]. Defendant was required to respond to the Amended Complaint by October 2, 2024, *see* Fed. R. Civ. P. 15(a)(3), and its counsel was served with the Amended Complaint by operation of Local Rule 5.1(e). To date, Defendant has failed to file a responsive pleading or otherwise defend the claims made against it in the Amended Complaint. Accordingly, Plaintiff respectfully requests entry of default against Defendant ZOOYEE.

Dated: December 23, 2024

Respectfully submitted,

**James M. Slater**

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